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10                  Attorneys for Defendant Signet Jewelers Limited

11                   **IN THE UNITED STATES DISTRICT COURT**  
12                   **FOR THE DISTRICT OF ARIZONA**

13                  Claudette Torrez, individually and on behalf  
14                  of all others similarly situated,  
15    Plaintiff,  
16                  v.  
17                  Signet Jewelers Limited,  
18    Defendant.

Case No. 2:24-cv-01332-SMB

**DECLARATION OF KACIE  
DONOVAN IN SUPPORT OF  
DEFENDANT'S MOTION TO  
DISMISS PLAINTIFF'S  
COMPLAINT (DOC. 1)**

(Assigned to the Hon. Susan M.  
Brnovich)

19                  I, Kacie Donovan, do hereby affirm and declare as follows:

20                  1.       I am an attorney at Greenberg Traurig LLP and counsel of record for  
21                  Defendant Signet Jewelers Limited ("Signet") in the above-captioned action. I have  
22                  personal knowledge of the facts set forth in this Declaration, and if called as a witness,  
23                  could and would competently testify as set forth below.

24                  2.       On August 25, 2024, at my direction, my colleagues viewed and  
25                  downloaded the current version of Signet's Privacy Policy, which is posted publicly at  
26                  <https://signetjewelers.com/privacy-policy/>. This Privacy Policy has been in place from  
27                  August 3, 2023, to present. A true and correct copy of this Privacy Policy is attached as  
28                  **Exhibit A.**

                  3.       On August 25, 2024, at my direction, my colleagues viewed and  
downloaded from the Wayback Machine the previous iteration of Signet's Privacy Policy,  
which was effective from approximately December 3, 2019, to August 2, 2023. The

1 Wayback Machine is a publicly available digital archive that allows users to review the  
2 contents of website pages as they existed at various points in the past. Attached hereto as  
3 **Exhibit B** is a true and correct copy of the Privacy Policy as it appeared on the webpage  
4 <https://signetjewelers.com/privacy-policy/> on or about January 27, 2023.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Executed on this 26 day of August, 2024.

7 By Katie D. Dorn  
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LAW OFFICES  
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